

Meeting Summary

EPA Directive BHHRA and BERA Comments Meeting

August 20, 2010

1. Use of COCs in FS and Beyond:

- The process to get from COIs to COCs and PRGs should be well documented
- EPA is comfortable with the sediment PRGs provided to LWG in April 2010 and considers them to incorporate EPA's risk management decisions made to date. EPA does not expect the risk assessment comments to modify the sediment PRGs. Changes, if any, are expected to be minor and could be made after the alternative screening process.

2. ARAR Evaluation in BHHRA

- EPA is willing to drop "ARAR evaluation" in the BHHRA because the LWG will evaluate compliance with ARARs in the FS
- Chemicals in surface water or TZW with concentrations that exceed agreed-upon screening levels should be considered COPCs and carried into the FS contaminant mobility evaluation in accordance with 2010 negotiations.

3. Risk Driver Section in BHHRA

- EPA is not comfortable with use of term "risk driver" in the baseline risk assessments as they believe it connotes risk management
- EPA OK with statements in risk characterization sections indicating which chemicals and pathways pose the majority of risk (per RAGS)
- EPA says guidance does not explicitly allow for risk management recommendations in BHHRA; risk management recommendations for human health could be contained in a separate document
- EPA says guidance allows for risk management section in BERA.

4. Directive Text Changes

- EPA open to considering LWG suggested language changes. LWG will provide specific proposed text changes for discussion at September 9th meeting.

5. Clam Consumption Scenario

- LWG needs to support statements regarding this EPA-required scenario (e.g., info about historical, current, or potential future clam populations, harvesting, and habitat); this documented information can be used in risk characterization.

Do Not Quote or Cite

This document is currently under review by US EPA and its federal, state and tribal partners, and is subject to change in whole or part

6. Risk Management

- Uncertainty analyses and risk management recommendations need to fairly balance “pros” and “cons”
- Discussed providing draft risk management recommendations to EPA by November 19, 2010.

7. Eco HQ's ≥ 1.0

- EPA explained that guidance says $HQ \geq 1.0$ indicates *potentially* unacceptable risk
- The parties discussed ecological risk assessment guidance and the BERA process; the results are summarized in the attached BERA Process Flow Chart.

8. Treatment of TZW

- EPA will go back and check all the previous agreements with LWG regarding TZW LOE and how it is to be handled in BERA. EPA did not intend to deviate from previous agreements on this or other matters.

9. Non-Directive RI Comments on Groundwater/TZW assessment

- LWG will provide list of those EPA comments where they have concerns that previous agreements were not reflected.

Do Not Quote or Cite

This document is currently under review by US EPA and its federal, state and tribal partners, and is subject to change in whole or part